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July 30, 2024

BY ECF

The Honorable Robyn F. Tarnofsky United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007

Re: Khodakhah v. Montefiore Health System, Inc.,

No. 1:24-cv-00839 (LAK) (RFT) (S.D.N.Y.)

Dear Judge Tarnofsky:

We write on behalf of the parties in the above-captioned action to provide an update on the status of mediation, which was previously scheduled for July 23, 2024. *See* ECF 42. Due to a family tragedy, Plaintiff's counsel was not able to attend mediation on July 23, and the parties have rescheduled the mediation for August 20, 2024.

In light of the parties' rescheduled mediation, and pursuant to this Court's Individual Rule I.E, the parties respectfully request that the Court extend Plaintiff's August 23, 2024 deadline for filing an amended complaint and the parties' August 30, 2024 deadline for submitting a proposed briefing schedule by an additional 30 days. *See* ECF 43. This is the fourth request for an extension of Plaintiff's deadline to file his amended complaint. Plaintiff previously requested and was granted a 30-day extension, and the parties jointly requested and were granted two additional extensions in light of the parties' anticipated mediation. All parties join in this request.

Respectfully submitted,

Gabrielle E. Tenzer

cc: Counsel for All Parties